

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	<u>[PROPOSED]</u>
	:	<u>PROTECTIVE ORDER</u>
- v. -	:	
	:	20 Cr. 330 (AJN)
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
- - - - -	x	

ALISON J. NATHAN, United States District Judge:

WHEREAS the Court has ordered production of materials from the Epstein Victims' Compensation Fund to the Court pursuant to Fed. R. Crim. P. 17(c) (the "Rule 17 Materials") (see Dkt. No. 496);

WHEREAS those materials are likely to contain information that would (i) affect the privacy and confidentiality of individuals, (ii) would risk prejudicial pretrial publicity if publicly disseminated, and (iii) are not authorized to be disclosed to the public or disclosed beyond that which is necessary for the trial in this action;

WHEREAS the Court has directed the parties to negotiate and submit a proposed protective order;

IT HEREBY IS ORDERED:

1. Any and all Rule 17 Materials disclosed to the Government, the defendant ("Defendant"), and/or to the defendant's criminal defense attorneys ("Defense Counsel," and

collectively with the Government, "the Parties") shall be treated as "Confidential Information" within the meaning of the Protective Order (Dkt. No. 36 ¶ 7) and shall be subject to the provisions thereof.

2. At the discretion of the Court, the Court may designate certain materials as "Highly Confidential" within the meaning of the Protective Order (Dkt. No. 36 ¶ 10) and subject to the provisions thereof.

SO ORDERED:

Dated: New York, New York  
November \_\_\_\_, 2021

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HONORABLE ALISON J. NATHAN  
United States District Judge